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20 Attorneys for Defendant

21 **UNITED STATES DISTRICT COURT**
22 **NORTHERN DISTRICT OF CALIFORNIA**
23 **SAN FRANCISCO DIVISION**

24 TECHCRUNCH, INC., et al.) **Case No. 3:09-cv-05812 RS**
25 Plaintiffs,)
26 vs.) **JOINT STIPULATION SEEKING STAY**
27 FUSION GARAGE PTE. LTD.,) **PENDING SETTLEMENT AND**
28 Defendant.) **[PROPOSED] ORDER**

1 WHEREAS, the parties in this action have executed a Memorandum of Understanding
2 regarding final settlement of this case;

3 WHEREAS, the parties believe they will be in a position to execute a definitive agreement
4 within fourteen days;

5 WHEREAS, the parties are facing imminent deadlines as set forth in the March 31, 2011
6 Case Management Scheduling Order (Docket Entry 206), as well as deadlines relating to ongoing
7 discovery and motion practice;

8 WHEREAS, the parties agree that if the anticipated final agreement does not take place, they
9 will jointly seek reasonable rescheduling of all dates, deadlines, motions, and other activities;

10 NOW THEREFORE, it is hereby stipulated by the undersigned counsel on behalf of the
11 parties identified below that:

12 All pending deadlines, motions, notices, subpoenas, and hearing dates be suspended or stayed
13 pending anticipated final agreement.

14 The case be temporarily stayed pending execution of the settlement or a report that the
15 settlement was not executed.

17 Dated: September 22, 2011

WINSTON & STRAWN LLP

19 By:

/s/

Andrew P. Bridges
David S. Bloch

21 Attorneys for Plaintiffs

22 Dated: September 22, 2011

QUINN EMANUEL URQUHART & SULLIVAN, LLP

25 By:

/s/

Claude M. Stern
Evette D. Pennypacker

27 Attorneys for Defendant

I, Andrew P. Bridges, hereby attest, pursuant to N.D. Cal. General Order No. 45, that the concurrence to the filing of this document has been obtained from each signatory hereto.

By: /s/
Andrew P. Bridges

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1 PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:

2 1. This case is hereby STAYED pending anticipated execution of a settlement
3 agreement.

4 2. All deadlines, motions, notices, subpoenas and hearing dates are SUSPENDED or
5 STAYED. The parties shall report the status of this case to the Court within fourteen days.

6 Dated: 9/23 2011
7 , 2010



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The Honorable Richard Seeborg
United States District Court Judge

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